

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN, LOSARTAN,  
AND IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**CERTIFICATION OF SETH  
A. GOLDBERG, ESQ.**

SETH A. GOLDBERG, ESQ., being of full age, certifies as follows:

1. I am a Partner at Duane Morris LLP, attorneys for Defendants Zhejiang Huahai Pharmaceutical Co, Ltd., Princeton Pharmaceutical Inc., and Solco Healthcare US, LLC. I am Liaison Counsel for all Defendants in this MDL. I make this Certification based on personal knowledge and in support of the Defendants' Memorandum of Law in Opposition to Plaintiffs' Motion to Preclude Opinions of Defense Expert John M. Flack, M.D., M.P.H.

2. Attached hereto as Exhibit A is a true and accurate copy of the Expert Report of John M. Flack, M.D., M.P.H., dated August 2, 2021, with Exhibits A & B served in MDL 2875.

3. Attached hereto as Exhibit B is a true and accurate copy of the transcript of the deposition of John M. Flack, M.D., M.P.H., in MDL 2875, dated September 28, 2021, with errata.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg, *Liaison Counsel  
for Defendants*

DUANE MORRIS LLP

30 South 17th Street

Philadelphia, PA 19103-4196

Tel.: (215) 979-1000

Fax: (215) 979-1020

SAGoldberg@duanemorris.com

*Attorney for Zhejiang Huahai  
Pharmaceutical Co, Ltd., Princeton  
Pharmaceutical Inc., and Solco  
Healthcare US, LLC*

Dated: December 1, 2021

DM1\12651812.1